

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



Jonathan Leite,
Plaintiff

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v.

Civil No. 15-cv-00280-PB

Matthew Goulet *et al.*,
Defendants

AFFIDAVIT OF ROBERT MORIN

I, Robert Morin, upon oath do hereby depose and state as follows:

1. I worked for the New Hampshire Department of Corrections at the Northern New Hampshire Correctional Facility (“NCF”) from 2008 to 2016. I make this affidavit based on my personal knowledge.

2. My job responsibilities at NCF on August 24, 2012 did not involve conducting rounds or counts on F-block. I did not participate in any rounds or counts on F-block on August 24, 2012.

3. Rather, I was assigned to the Central Control room where I am responsible for numerous duties involving the general operation of the entire facility. Although in 2012 Central Control had access to view every camera within the prison, monitoring the video footage individual housing units within NCF not a primary responsibility of the officers working in Central Control, who are, instead, focused on the overall operation of the facility with special emphasis on monitoring and assisting those individuals entering and exiting the prison, the perimeter of the prison, and the frequent staff and inmate movements throughout the area of the prison surrounding Central Control.

4. At no point on August 24, 2012 did I view any video footage of the F-block housing unit that caused me any concern for the safety of the inmates within that unit.

5. At no point on or prior to August 24, 2012 was I informed by an inmate Leite or any other individual that Mr. Liete or any other individual was at risk of an assault or any other harm.

6. I also did not work in the NCF visiting room on August 24, 2012, and, therefore, I did not participate in post-visit searches of inmates on that date.

7. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: October 10, 2017

/s/ Robert Morin
Robert Morin